

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 22-CR-20104-JEM

UNITED STATES OF AMERICA,

v.

JOSEPH JOEL JOHN,

Defendants.

OBJECTIONS TO THE PRE-SENTENCE INVESTIGATION REPORT

COMES NOW the undersigned counsel for Defendant, Joseph Joel John, and files these Objections to the Pre-Sentence Investigations Report and in support, would state as follows:

1. Mr. John objects to paragraph 98 of the Pre-Sentence Investigation Report, found on page 24. Specifically, Mr. John objects to the three-level enhancement as the victim of the charged offense was not a federal, state, or county official as contemplated in 18 USSG § 3A1.2(a). The guidelines do not contemplate this enhancement being applicable to government officials of foreign countries, as is the case here.

2. Mr. John objects to paragraph 99 of the Pre-Sentence Investigation Report, found on page 24. Specifically, Mr. John objects to the twelve-level enhancement attributed to the charged conduct pursuant to 18 USSG § 3A1.4(a) because the conduct does not satisfy the requirements of the Federal Crime of Terrorism as defined in 18 USC § 2332(b)(g)(5)

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on or before December 13, 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day via the transmission of the Notice of Electronic Filing generated by CM.ECF to: Andrea Goldbarg and Monica Castro, Assistant United States Attorneys, Federal Justice Building, 99 N.E. 4th Street, Miami, Florida 33132-2111

Respectfully submitted,

The Kirlew Law Firm, PLLC

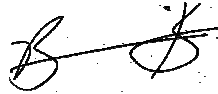
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By: _____

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